



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

January 16, 2020

**BY ECF**

The Honorable Victor Marrero  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Bill Tsai*  
19 Cr. 675 (VM)

Dear Judge Marrero:

It has come to the parties' attention that there is an error in the transcription of the change of plea hearing that occurred on September 19, 2019, in the instant matter. Specifically, the transcript states that "Count One of the information charges [the defendant] with securities fraud in connection with an insider trading scheme in violation of 15, United States Code, 78b . . . ." (Tr. 7.) Information 19 Cr. 675, to which the defendant pled, charged the defendant with one count of securities fraud in connection with an insider trading scheme in violation of, among other things, Title 15, United States Code, Section 78j(b), not section 78ff. Accordingly, the parties request that at the defendant's sentencing, the Court make clear on the record that despite the transcription error, the defendant did in fact plead guilty to Information 19 Cr. 675, charging him with violating, among other things, Title 15, United States Code, Section 78j(b), not Section 78b.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

A handwritten signature in blue ink, reading "Robert L. Boone", is written over a horizontal line.

By: \_\_\_\_\_

cc: Defense counsel (by ECF)

Robert L. Boone  
Assistant United States Attorney  
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